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This Stipulation is entered into by and between Plaintiffs on the one hand, and Specially Appearing Defendants Bonnie Nichols and Wholesale Universe, on the other hand, through their respective counsel of record.

WHEREAS, Plaintiffs have received third-party documents and intend to amend the currently operative First Amended Complaint to add new defendants and new allegations about existing defendants;

WHEREAS, Plaintiffs require additional time to investigate entities and individuals to potentially be added as defendants, and to further investigate forthcoming new allegations about existing defendants;

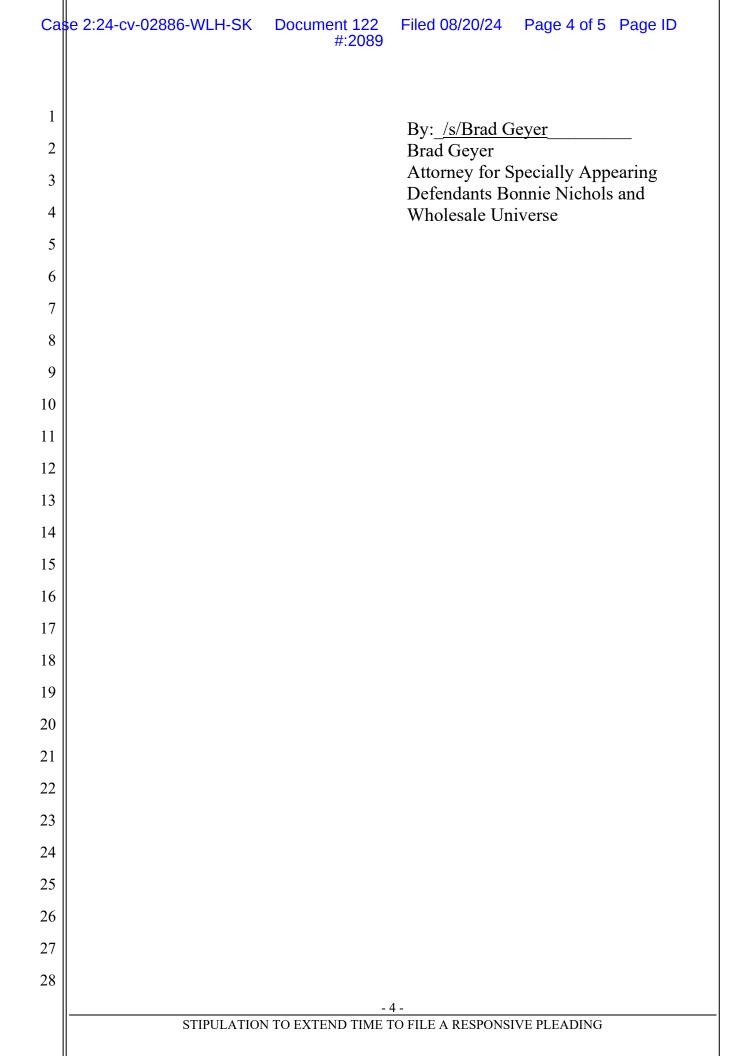
WHEREAS, Plaintiffs anticipate receiving additional discovery from Wells Fargo, Thread Bank, Bank of America, and JP Morgan—including discovery of account statements, wire transfers, and third-party-agent/payment-processor transaction data—within the next six weeks;

WHEREAS, Plaintiffs anticipate that the new discovery, will significantly further inform Plaintiffs' allegations;

WHEREAS, it would be most efficient—and in the interests of justice—for Plaintiffs to wait to file a second amended complaint until Plaintiffs have reviewed the forthcoming discovery that they anticipate receiving shortly;

WHEREAS, it would also be inefficient for Specially Appearing Defendants to respond to the currently operative complaint when the parties anticipate that another amended complaint will be filed;

IT IS HEREBY STIPULATED AND AGREED by the parties as follows: 1 2 The deadline for Specially Appearing Defendants Bonnie Nichols and 3 Wholesale Universe to file responsive pleadings to the current complaint should be 4 stayed. 5 Specially Appearing Defendants Bonnie Nichols and Wholesale Universe 6 7 should be ordered to file a responsive pleading no later than 30 days from the date 8 Plaintiffs file and serve their Second Amended Complaint. 10 This stipulation is made without prejudice to any party's right to seek further 11 extensions or modifications by agreement or by order of the Court for good cause. 12 IT IS SO STIPULATED. 13 14 Dated: August 20, 2024 15 /S/ Nico Banks Nico Banks (CA SBN:344705) 16 BANKS LAW OFFICE 17 712 H St NE, Unit #8571 Washington, DC 20002 18 Tel.: 971-678-0036 19 Email: nico@bankslawoffice.com 20 Richard A. Nervig (CA SBN:226449) 21 RICHARD A. NERVIG, P.C. 501 West Broadway, Suite 800 22 San Diego, CA 92101 23 Phone: 760-451-2300 Email: richard@nerviglaw.com 24 25 Attorneys for Plaintiffs 26 27 28



1	WORD COUNT COMPLIANCE CERTIFICATION
2 3	The undersigned, counsel of record for Plaintiffs, certifies that this brief contains fewer than 7,000 words, which complies with the word limit of L.R. 11-6.1
4	/s/Nico Banks
5	Jico Banks Dated: August 20, 2024
6	
7	<u>ATTESTATION</u>
8	
9	Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and or
10	whose behalf the filing is submitted, concur in the filing's content and have
11	authorized the filing.
12	
13	/s/Nico Banks Nico Banks
14	T Web Builts
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